

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

BKL HOLDINGS, INC.
D/B/A LICENSE COACH

Plaintiff,

V.

GLOBE LIFE INC.; AMERICAN INCOME LIFE INSURANCE COMPANY; LIBERTY NATIONAL LIFE INSURANCE COMPANY; FAMILY HERITAGE LIFE INSURANCE COMPANY OF AMERICA; JAMES “BO” E. GENTILE, JR.; and DAVID ZOPHIN.

Defendants.

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**CIVIL ACTION NO. 4:22-cv-00170-ALM**

## MOTION TO WITHDRAW

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Anthony L. Vitullo formerly of the law firm FEE, SMITH, SHARP & VITULLO, LLP (hereinafter referred to as the “Movant”), former counsel for BKL HOLDINGS, INC. D/B/A LICENSE COACH (hereinafter referred to as the “Plaintiff”), and files this Motion to Withdraw and Substitute Counsel and Notice of Appearance of New Counsel and respectfully show this Honorable Court the following:

Effective May 20, 2022, Anthony L. Vitullo is no longer affiliated with the law firm of FEE, SMITH, SHARP & VITULLO, LLP and is no longer involved in this case. The Plaintiff has consented to the withdrawal of Anthony L. Vitullo.

Anthony L. Vitullo will not continue to serve as counsel for Plaintiff in this matter.

The following attorney has previously filed a Notice of Appearance as counsel of record

for Plaintiff and will continue as counsel for Plaintiff:

Richard W. Winn  
State Bar No. 21779700  
FRIEDMAN & FEIGER, LLP  
Three Galleria Tower  
5301 Spring Valley Road, Suite 200  
Dallas, Texas 75254  
(972) 788-1400 Telephone  
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**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** the Movant respectfully moves this Honorable Court for an Order permitting and granting the withdrawal of the Movant as counsel of record for Plaintiff, and providing that the Movant is relieved of any further responsibility associated with the representation of the Plaintiff. The Movant respectfully requests such further general or specific relief to which he may be entitled.

Respectfully submitted,



Anthony L. Vitullo  
State Bar No. 20595500  
4320 Valley Ridge Road  
Dallas Texas 75220  
214 418-0400

**FORMER ATTORNEYS FOR  
PLAINTIFF**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing document has been served on all counsel of record in this cause of action on June 3, 2022, in accordance with Rule 21a of the Texas Rules of Civil Procedure to:

  
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Anthony L. Vitullo